

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Kathleen Corbett

Debtor

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Chapter 13

18-18484 JKF

OBJECTION TO PROOF OF CLAIM NUMBER ~~Four~~ (4) FILED BY LVNV  
FUNDING, LLC

COMES NOW, Kathleen Corbett, hereinafter referred to as "Debtor," by and through her undersigned counsel, Brad J. Sadek, Esquire, hereby objects to Proof of Claim number Four filed by LVNV Funding, LLC (hereinafter referred to as "Claimant") and in support thereof avers the following:

1. Debtor filed the instant Chapter 13 Bankruptcy case on or about December 31<sup>st</sup>, 2018.
2. The filing was assigned case number 18-18484 JKF.
3. On or about January 9<sup>th</sup>, 2019 Claimant filed an Unsecured Proof of Claim in the amount of \$430.88. A true and correct copy of the Proof of Claim, numbered 4 on the Claims Register, is attached hereto, incorporated herein and marked as Exhibit "A."
4. Debtor did not pay back or revive this debt in any way within the four years preceding the filing date of this Chapter 13 Bankruptcy.
5. Said proof of claim states that the last payment date was in 2004.
6. Claimant does not have a legal right to assert this claim, as said claim exceeds the Pennsylvania Statute of Limitations pursuant to 42 Pa. C.S. Chapter 55, § 5525.

WHEREFORE, Debtor Kathleen Corbett, respectfully requests that this Honorable Court disallow and strike the proof of claim filed by LVNV FUNDING, LLC and order such other and further relief as is just and proper.

Respectfully submitted,

Dated: February 14<sup>th</sup>, 2019

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/s/ Brad J. Sadek, Esq.  
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